

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA
MARTINSBURG**

UNITED STATES OF AMERICA,

v.

**Criminal Action No. 3:20-CR-42
(GROH)**

TIMOTHY JOHN WATSON,

Defendant.

UNITED STATES' UNOPPOSED MOTION FOR PROTECTIVE ORDER

Now comes the United States of America and William J. Powell, United States Attorney for the Northern District of West Virginia, by Jarod J. Douglas, Assistant United States Attorney for said District, and pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure and Rule 16.09 of the Local Rules of Criminal Procedure, move the Court to enter a protective order restricting access of the discovery to counsel for the defendant. The following is stated in support of this motion.

1. Many of the discovery documents contain sensitive and personal identifying information about various individuals. These discovery documents also include confidential informant information. Because these discovery documents are voluminous, the expense of time and other resources to redact such information is not a guarantee that such information will not remain due to human error, or otherwise. Accordingly, the United States has legitimate concerns about releasing sensitive personal information and confidential informant information without adequate protections in place.

2. The undersigned has discussed these concerns with counsel for the defendant. As a result of these discussions, the defendant and the undersigned have agreed to propose the attached

protective order in lieu of redactions of the personal identifying information. See Exhibit No. 1, Proposed Protective Order.

WHEREFORE, the United States requests that the Court enter the attached protective order.

Respectfully submitted,

WILLIAM J. POWELL
UNITED STATES ATTORNEY

By: /s/ Jarod J. Douglas
Jarod J. Douglas
Assistant U. S. Attorney

CERTIFICATE OF SERVICE

I, Jarod J. Douglas, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that on the 18th day of November 2020, the foregoing UNITED STATES' UNOPPOSED MOTION FOR PROTECTIVE ORDER, including Exhibit No. 1, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Shawn McDermott, Esq.
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Counsel for Defendant

WILLIAM J. POWELL
UNITED STATES ATTORNEY

By: /s/ Jarod J. Douglas
Jarod J. Douglas
Assistant United State Attorney